

## UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

In the Matter of the Search of

USPS Priority Mail parcel bearing label numbers 9405 5368  
 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23, both of  
 which are addressed to "RILEY HARRIS, 2287 HEDGE GROW  
 RD, UNIT C, COLUMBUS, OH 43220-6373."

Case No. 2:21-mj-637

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel bearing label numbers 9405 5368 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23, both of which are addressed to "RILEY HARRIS, 2287 HEDGE GROW RD, UNIT C, COLUMBUS, OH 43220."

located in the Southern District of Ohio, Eastern Division, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Section 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

*Code Section**Offense Description*

Title 21 USC 841(a)(1) Distribution and possession with intent to distribute a controlled substance

Title 21 USC 843(b) Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

See the attached Affidavit of U.S. Postal Inspector Mohamed A. Sabrah, which is fully incorporated herein.

- Continued on the attached sheet.
- Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

*Mohamed A. Sabrah, U.S. Postal Inspector*  
*Printed name and title*



Sworn to before me and signed in my presence.

Date: 10-4-21

City and state: Columbus, Ohio

*Chelsey M. Vascura, U.S. Magistrate Judge*  
*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

10/11/21  
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IN THE MATTER OF THE SEARCH OF:

USPS Priority Mail parcel bearing label no.  
9405 5368 9523 2407 0360 32 and 9405 5368  
9523 2407 0362 23 , both of which are  
addressed to "RILEY HARRIS, 2287  
HEDGEROW RD, UNIT C, COLUMBUS,  
OH 43220-6373."

Case No. \_\_\_\_\_

MAGISTRATE JUDGE  
CHELSEY M. VASCURA

**Affidavit in Support of Application for Search Warrant**

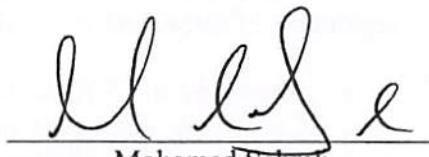
I, MOHAMED A. SABRAH, DO HEREBY DEPOSE AND SAY:

1. I have been a U.S. Postal Inspector for the U.S. Postal Inspection Service (USPIS) since February 2016, enforcing federal mail and drug laws. I am currently assigned to Columbus, Ohio. I have received training at U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local law enforcement units. I have received an additional 40 hour Prohibited Mailings training by the U.S. Postal Inspection Service.
2. I know from my training and experience, and the training and experience of other Postal Inspectors, that the U.S. Mail is often used by drug traffickers to transport controlled substances as well as U.S. currency derived from their illicit activities, either as proceeds and/or payment. I know from my training and experience the Priority Mail system is commonly used to transport controlled substances and associated currency because Priority Mail provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of Priority Mail places time pressures on law enforcement agents to identify, search, and plan the delivery of these parcels in a timely manner.
3. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail network. Inspectors routinely review shipment documents and Priority Mail packages originating from or destined to drug source areas, to identify instances where there is a possibility of drug trafficking.
4. On or about September 28, 2021, law enforcement identified U.S. Postal Service Priority Mail parcels bearing label numbers 9405 5368 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23 (SUBJECT PARCELS), which are believed to contain narcotics, in violation of Title 21, United States Code, Sections 841(a)(1) (distribution and possession with intent to distribute a controlled substance) and 843(b) (illegal use of mail in furtherance of narcotics trafficking). Inspectors identified these parcels as a suspected drug parcels based on the information above and several other characteristics, including but not limited to type of mail, origin,

5. On October 1, 2021, Postal Inspectors took custody of U.S. Postal Service Priority Mail parcels bearing label numbers 9405 5368 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23, both of which are addressed to "RILEY HARRIS, 2287 HEDGE GROW RD, UNIT C, COLUMBUS, OH 43220-6373", and contain a return address of "SONOMA HYDRAULICS LLC, 923 BUSH ST, SANTA ROSA, CA 95404". The subject parcels are currently being held at the U.S. Postal Inspection Service, Columbus Domicile, in Columbus, Ohio.
6. Parcel label number 9405 5368 9523 2407 0360 32 is further described as a Staples large rectangle brown box, measuring 24" x 16" x 10". This parcel was mailed on September 27, 2021, from the Santa Rosa, California 95407 post office with electronic postage affixed.
7. Parcel label no. 9405 5368 9523 2407 0362 23 is further described as a generic brown box, measuring 15" x 15" x 112". This parcel was mailed on September 27, 2021, from the Santa Rosa, California 95407 post office with electronic postage affixed.
8. Your affiant ran both the return and recipient addresses in CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information.
  - a. According to CLEAR, the return address 923 BUSH ST, SANTA ROSA, CA 95404, does exist but Sonoma Hydraulics LLC cannot be associated with the return address. Open source research also did not reveal any connection between Sonoma Hydraulics LCC and the return address.
  - b. According to CLEAR, the recipient address 2287 HEDGE GROW RD, UNIT C, COLUMBUS, OH 43220, does exist, and Harris can be associated as an occupant.
9. Your affiant knows that in the past, drug traffickers have used legitimate addresses belonging to others for the sender/return address, in an attempt to legitimize and distance themselves from the shipment in the event that the parcel is seized by law enforcement officers. Your affiant also knows that online drug traffickers sometimes require their buyers to provide their real names and addresses, in order to prevent packages from being mis-sent, returned, delayed or raise law enforcement suspicion. Additionally, California is a known source area for shipment of illegal narcotics to Central Ohio as well as other areas of the United States.
10. I know from my training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, for which narcotic-sniffing canines are trained to alert, on the box, contents of the box, and/or other packaging material they handle.
11. On October 1, 2021, Postal Inspectors contacted Officer Kenneth Coontz, Columbus Police Department, who is the handler for "Elvis", a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack", heroin, methamphetamine, and

their derivatives. K-9 "Elvis" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Elvis" has successfully detected narcotics, demonstrating clear, positive, aggressive alerts, and establishing himself as a highly reliable police dog.

12. The subject parcel was hidden among other packages, and "Elvis" was allowed to search the entire area. Officer Coontz concluded that K-9 "Elvis" did alert positively to U. S. Postal Service Mail parcels bearing label numbers 9405 5368 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23. Based on the alerts, Officer Coontz concluded that the odor of one of the drugs that K-9 "Elvis" is trained and certified to detect was present in each of the parcels.
13. Based on the information contained herein, your affiant maintains there is probable cause to believe that the USPS Priority Mail parcels bearing tracking numbers 9405 5368 9523 2407 0360 32 and 9405 5368 9523 2407 0362 23, addressed to "RILEY HARRIS, 2287 HEDGE GROW RD, UNIT C, COLUMBUS, OH 43220", contains controlled substances, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).



Mohamed Sabrah  
United States Postal Inspector

Sworn to before me, and subscribed in my presence, this 4 day of October, 2021 at Columbus, Ohio.



Honorable Chelsey M. Vascura  
U.S. MAGISTRATE JUDGE